

1

2

3

4

5

6

7

8

9

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

12

13 CHASOM BROWN, WILLIAM BYATT,
14 JEREMY DAVIS, CHRISTOPHER
15 CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

16 Plaintiffs,

17 v.

18 GOOGLE LLC,

19 Defendant.

20

21

22

23

24

25

26

27

28

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Judge: Hon. Susan van Keulen

[PROPOSED] ORDER

2 Before the Court is Plaintiffs' Motion Re: Sealing Portions of Google's Responses to
3 Plaintiff's Objections to Special Master's Report and Recommendation on Referred Discovery
4 Issues (Preservation Plan) ("Motion"). Having considered the Motion, supporting declaration, and
5 other papers on file, and good cause having been found, the Court **ORDERS** as follows:

| Document | Text To Be Sealed | Basis for Sealing Portion of Document |
|--------------------|--|--|
| Google's Responses | GRANTED as to the portions at: Pages: 2:7-8, 2:26-27, 3:4-7, 3:22-24, 4:5, 5:14, 5:25-27, 6:10-11, 6:14, 6:17, 6:19-21, 7:2-5 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Trebicka Exhibit 1 | GRANTED as to the portions at: Redacted in its Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective |

| | | |
|--------------------------------|---|--|
| | | Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Declaration of Richard Harting | GRANTED as to the portions at: Pages: 1:22-23, 2:3-6, 2:8-10, 2:13-26, 2:28, 3:1-7, 3:10-12, 3:14-15 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |

SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge